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10 Attorneys for the United States of America

11  
12 UNITED STATES DISTRICT COURT  
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
14 WESTERN DIVISION

15 DONALD LEO MELLEIN,

16 Plaintiff,

17 v.

18 UNITED STATES OF AMERICA, et  
19 al.,

20 Defendants.

No. 2:23-cv-07970-RGK-MAR

**STIPULATION TO EXTEND TIME TO  
RESPOND TO INITIAL COMPLAINT  
BY NOT MORE THAN 30 DAYS (L.R.  
8-3)**

Complaint served: Oct. 16, 2023 (United  
States) and Oct. 17, 2023 (Lynne Zellhart)  
Current response dates: Dec. 15, 2023  
(United States) and Dec. 18, 2023 (Lynne  
Zellhart)  
New response date: Jan. 16, 2023 (United  
States and Lynne Zellhart)

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25 Counsel for plaintiff Donald Leo Mellein (“Plaintiff”) and defendants United  
26 States of America (“United States”) and Lynne Zellhart (the United States and Lynne  
27 Zellhart are hereinafter collectively referred to as the “Defendants”) hereby enter into the  
28 following stipulation to extend Defendants’ deadline to respond to the Complaint. The

1 stipulation is based on the following:

2 1. Plaintiff served his Complaint on defendant United States on October 16,  
3 2023 and on defendant Lynne Zellhart on October 17, 2023.

4 2. The United States' deadline to respond to the Complaint is December 15,  
5 2023. Defendant Zellhart's deadline to respond to the Complaint is December 18, 2023.

6 3. The parties hereby stipulate that Defendants shall have an additional thirty  
7 (30) days to respond to the Complaint such that the United States' and Lynne Zellhart's  
8 deadline to respond to the Complaint shall be January 16, 2024.

9 Dated: December 13, 2023 Respectfully submitted,

10 INSTITUTE FOR JUSTICE  
11 Joseph Gay\*  
12 Robert Frommer\*  
13 Robert E. Johnson\*

14 THE VORA LAW FIRM, P.C.  
15 Lou Egerton-Wiley  
16 Nilay U. Vora  
17 Jeffrey Atteberry

18 /s/ Joseph Gay

19 JOSEPH GAY

20 Counsel for Plaintiff

21 \* Admitted *pro hac vice*

22 Dated: December 13, 2023

23 E. MARTIN ESTRADA

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26 Assistant United States Attorney

27 Chief, Civil Division

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/s/ Jasmin Yang

JASMIN YANG

Assistant United States Attorney

Attorneys for the United States of America and  
Lynne Zellhart

ATTESTATION UNDER LOCAL RULE 5-4.3.4

I, Jasmin Yang, am the ECF User whose ID and password are being used to file this STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS (L.R. 8-3). In compliance with Local Rule 5-4.3.4(a)(2), I hereby certify and attest that Plaintiff's counsel, Joseph Gay, has concurred in this filing.

DATED: December 13, 2023

*/s/ Jasmin Yang*

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JASMIN YANG

Assistant United States Attorney